

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**DECLARATION OF JEAN PAUL SARKIS IN SUPPORT OF DEFENDANTS'  
OPPOSED MOTION FOR INTRA-DISTRICT TRANSFER OF VENUE**

I, Jean Paul Sarkis, declare as follows:

1. I am employed as SVP, Dell Digital — Technology Enablement Solutions at Dell.

I am over the age of 18 and am competent to make the declaration set forth below.

2. I submit this declaration in support of Defendants Dell Technologies Inc.’s and Dell Inc.’s (collectively, together with their corporate affiliates, “Dell’s”) motion for intra-district transfer to the Austin Division of the Western District of Texas in the above-captioned litigation. In my role as SVP, Dell Digital — Technology Enablement Solutions, I am responsible for the technology in our IT locations, which include the primary repositories for Dell’s business records.

4. In making this declaration, I have relied on Dell IT's records showing the locations of the servers storing Dell's electronic information as well as on my own personal knowledge. Those records are created from information transmitted by knowledgeable persons, and are kept in the course of our regularly conducted business activity. It is Dell's regular practice to maintain the records upon which I relied.

5. I have been informed and understand that plaintiff Neo Wireless, LLC ("Neo") has sued Dell in the Waco Division of the Western District of Texas. I am further informed and understand that the Waco Division of the Western District of Texas includes the following counties: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell.

6. Dell IT supports approximately 9803 database servers located in the United States, and 29 other countries. These database servers are the primary repositories for Dell's business records. Most of these servers are located in Austin or Round Rock, Texas. Dell's records confirm that approximately 8657 of the servers are located in Austin or Round Rock, Texas, approximately 317 are in other States, including California, Massachusetts, Minnesota and North Carolina, and the remaining 829 are located outside the United States.

7. To the best of my knowledge, Dell IT does not maintain any servers in the Waco Division of the Western District of Texas. I am not aware of any servers in the Waco Division. I reviewed Dell's relevant IT records, and they also do not show any servers in the Waco Division.

8. Attached as Exhibit A is a table showing the number of IT-supported database servers grouped by country. This table was generated from IT records Dell maintains in the ordinary course of its business.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 14, 2021, in Austin, Texas.

Jean Paul Sarkis  
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